

Open Payments

Phase 1 Step-by-Step CMS Enterprise Portal Registration for Physicians and Teaching Hospitals

OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY
INTO INDUSTRY-PHYSICIAN
FINANCIAL RELATIONSHIPS

June 2014

CMS Disclaimer: This information is a summary of the final rule implementing Open Payments (Medicare, Medicaid, Children's Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests [CMS-5060-F], codified at 42 CFR Parts 402 and 403) The summary is not intended to take the place of the final rule which is the official source for information on the program.

Open Payments (the Sunshine Act) Review

Who is responsible for reporting?

Applicable manufacturers of covered products <u>AND</u> entities under common ownership with applicable manufacturers who also provide assistance and support are required to annually report to CMS:

- Payments or other transfers of value made to physicians and teaching hospitals.
- Certain ownership or investment interests held by physician owners or investors or their immediate family members.

Applicable group purchasing organizations (GPOs) are required to annually report to CMS:

- Payments or other transfers of value made to physicians.
- Certain ownership or investment interests held by physician owners or investors and their immediate family members.

Open Payments (the Sunshine Act) Review

Who is reported on?

Covered Recipient Physicians

- Doctors of medicine or osteopathy practicing medicine or surgery
- Doctors of dental medicine or dental surgery practicing dentistry
- Doctors of podiatric medicine
- Doctors of optometry
- Chiropractors
- All legally authorized by the state to practice

Covered Recipient Teaching Hospitals

- The hospitals that CMS has recorded as receiving payment(s) under Medicare direct graduate medical education (GME), indirect medical education (IME) or psychiatric hospitals IME programs
- Each year, Open Payments publishes a list of affected teaching hospitals; the list is available on the Open Payments website at http://go.cms.gov/openpayments

Physician Owners or Investors

- Physicians who are owners or investors of an applicable manufacturer or GPO
- Immediate family members who have ownership or investment interest in an applicable manufacturer or GPO: spouse, natural or adoptive parent, child, or sibling, stepparent, stepchild, stepbrother, or stepsister, father, mother-, daughter-, son-, brother-, or sister-in-law, grandparent or grandchild, spouse of a grandparent or grandchild

Open Payments (the Sunshine Act) Registration Overview

Registration Overview

- Registration is required for physicians and teaching hospitals to review or dispute the following information reported about them by applicable manufacturers and GPOs:
 - Payments made to physicians and teaching hospitals,
 - Other transfers of value made to physicians and teaching hospitals, or
 - Ownership or investment interests held by physicians or their immediate family members
- Registration will be conducted in two phases this first reporting year.

Phase 1 Registration for Physicians and Teaching Hospitals: EIDM

- Begins June 1, 2014
 - Physicians and teaching hospitals register in EIDM
 - Request access to theOpen Payments systemvia EIDM



Phase 2 Registration for Physicians and Teaching Hospitals: Open Payments System

- Begins July 2014
 - Physicians and teaching hospitals use
 EIDM registration credentials to register in the Open Payments system
 - Once physicians and teaching hospitals are registered in the Open Payments system, they are able to participate in the review, and dispute process

^{*}Guidance on how to use EIDM registration credentials to register in the Open Payments system, and how to review and dispute submitted data is forthcoming

Phase 1 Registration in EIDM: Identity Verification Process

EIDM Identity Verification Overview

- CMS' Enterprise Identity Management system (EIDM) is how CMS verifies user identities
- Identity verification is the process of providing information (e.g., identity history, credentials, or documents) for the purpose of proving that a person is the same person he or she claims to be
- Individuals requesting electronic access to CMS protected information or systems must first have their identities verified

EIDM Identity Verification (cont.)

- All users who register for EIDM have their identities verified
- EIDM matches information entered by users to information provided by Experian
- Out of Wallet (OOW) questions are also used to verify identity
- OOW questions ask for private data and contain information pulled from your credit report such as:
 - Mortgage lender name
 - Previous employer name
 - Auto lender name
- OOW questions and answers are shared only between the EIDM registrant and the verification service provider, Experian; the information will not be stored in EIDM

EIDM Identity Verification (cont.)

- A soft credit inquiry will be made during EIDM registration
- Soft credit inquiries are visible only to the EIDM registrant and only appear on credit reports produced by Experian (shown as an inquiry made by CMS)
- Identity proofing does not affect credit score
- Contact Experian Proofing Support Services for assistance with failed identity proofing: 1-866-578-5409

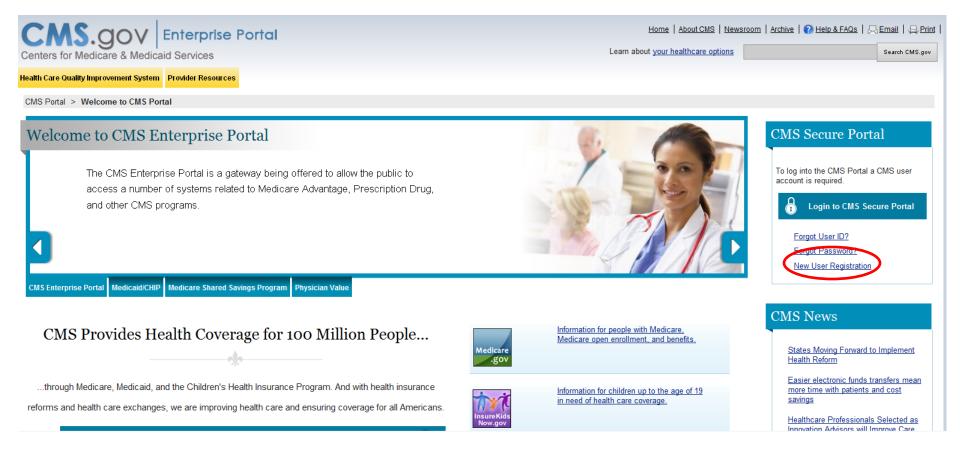
Phase 1 Registration: EIDM New User Registration

EIDM Registration Overview

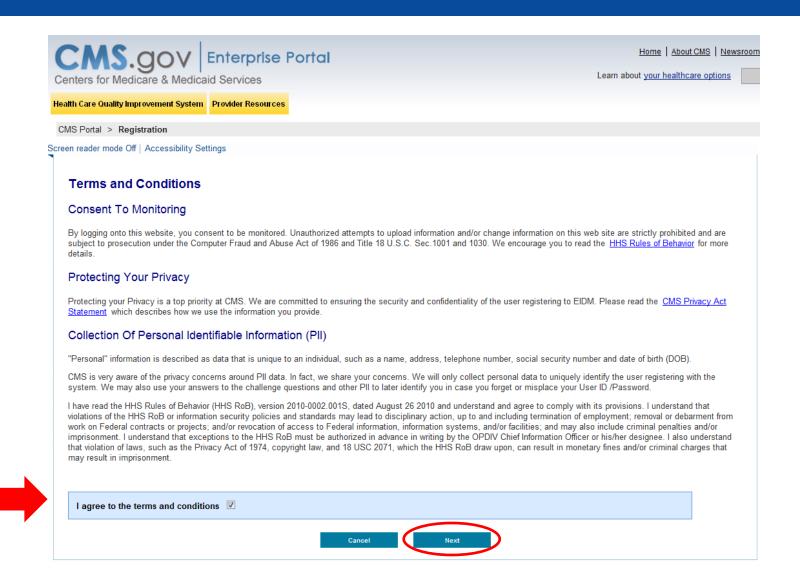
- EIDM registration is required for access to the Open Payments system
- EIDM registration process is the same for all users
- You may already have an EIDM account if you use the Health Insurance Oversight System (HIOS), the Medicaid and CHIP Program System (MACPro), or other CMS systems

Step 1: Go to CMS Enterprise Portal and Select "New User Registration"

https://portal.cms.gov



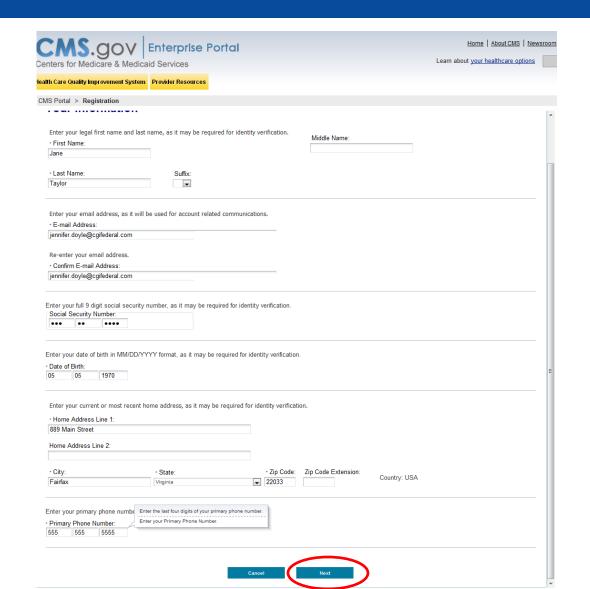
Step 2: Accept Terms & Conditions



Step 2: Accept Terms & Conditions (cont.)

- Two sections are particularly important to read:
 - 1. Consent to monitoring
 - 2. Collection of Personal Identifiable Information or PII
- Consent to monitoring means that you agree to allow CMS to monitor you while you are on systems accessed through EIDM
- **PII** is information that can be used to uniquely identify, contact, or locate a single person or can be used with other sources to uniquely identify a single individual; PII is collected to aid in the identity verification process
- Identity verification is required for all users requesting access to any CMS application
- Personal information collected will be used for the purposes of verifying your identity only
- Once you have read the terms and conditions, check the box labeled "I agree to the terms and conditions" before selecting "Next" to continue

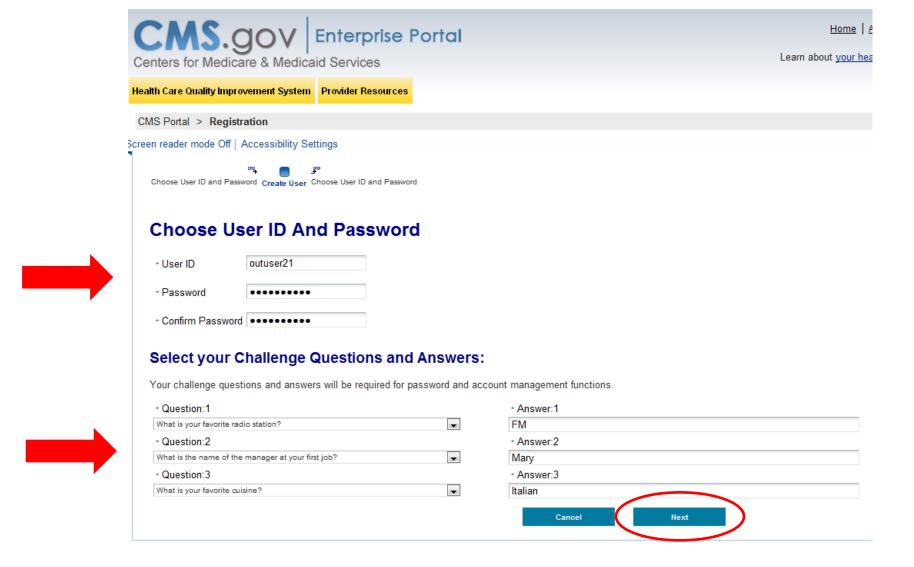
Step 3: Enter Personal Information



Required fields are marked with an asterisk.

Completing all fields, even those that are not required, will speed-up identity verification.

Step 4: Select User ID, Password, and Challenge Questions



User ID and Password Criteria

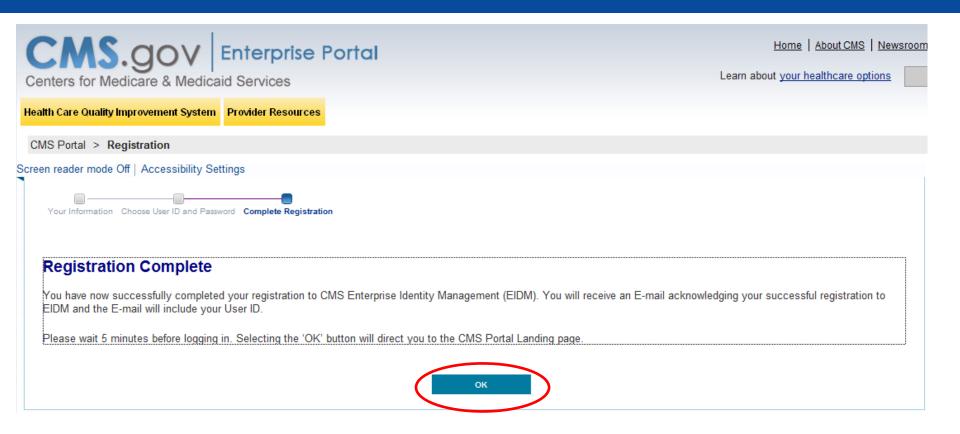
User ID

- Must be a minimum of 6 and a maximum of 74 characters
- Special characters permitted: dashes (-), underscores (_), apostrophes
 ('), periods (.), and at signs (@)

Password

- Must be a minimum of 8 and a maximum of 20 characters
- Must contain at least 1 number, 1 uppercase letter, and 1 lowercase letter
- Cannot contain your user ID and must differ from your previous 6 passwords
- Must be changed every 60 days
- EIDM will prompt for password change when the 60 day deadline approaches

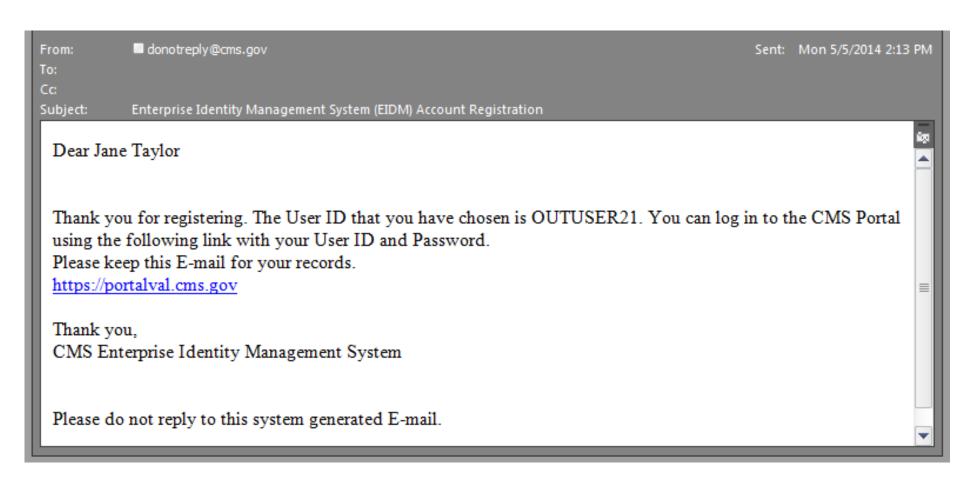
Step 5: Registration Complete



Click on "OK" to exit and return to the CMS Enterprise Portal home page.

After clicking on OK, you will receive a confirmation email message that contains your user ID and a link to the CMS Enterprise Portal.

Confirmation Email



Unsuccessful EIDM Registration

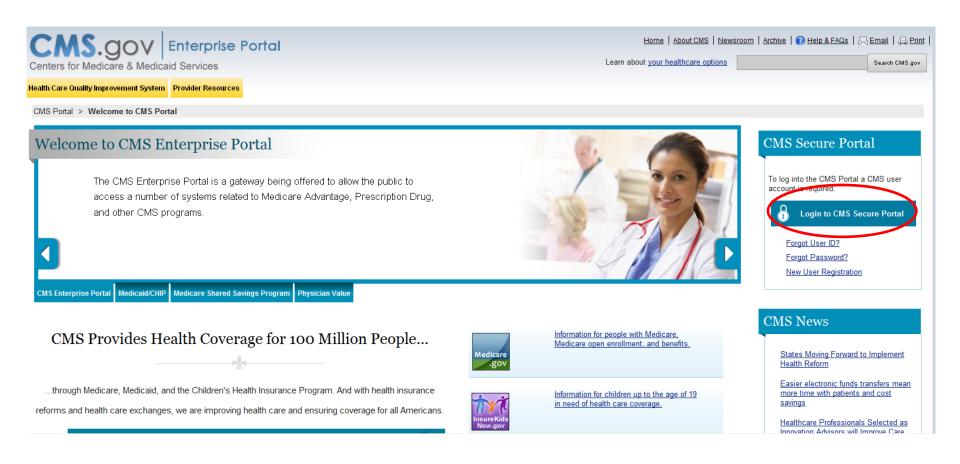
- Individuals with addresses outside of the United States may not register successfully in EIDM
- They should contact the Open Payments Help Desk for assistance with EIDM registration
- Any additional EIDM issues should be directed to the Open Payments Help Desk at openpayments@cms.hhs.gov

Using EIDM Registration Credentials to Request Access to the Open Payments System

Requesting Access to the Open Payments System

- In Phase 2 registration, this request in EIDM will allow the individual access to the Open Payments system
- Request for this access can occur only after EIDM registration is successful
- Request for this access is made through the CMS Enterprise Portal

Step 1: On CMS Enterprise Portal, select "Login to CMS Secure Portal"



Step 2: Accept Terms & Conditions

Home | About CMS | Newsroom | Archive | ? Help & FAQs | 🖳 Email | 🖨 Print



Health Care Quality Improvement System

Provider Resources

Terms and Conditions

You are accessing a U.S. Government information system, which includes (1) this computer, (2) this computer network, (3) all computers connected to this network, and (4) all devices and storage media attached to this network or to a computer on this network. This information system is provided for U.S. Government-authorized use only.

Unauthorized or improper use of this system may result in disciplinary action, as well as civil and criminal penalties.

By using this information system, you understand and consent to the following:

You have no reasonable expectation of privacy regarding any communication or data transiting or stored on this information system.

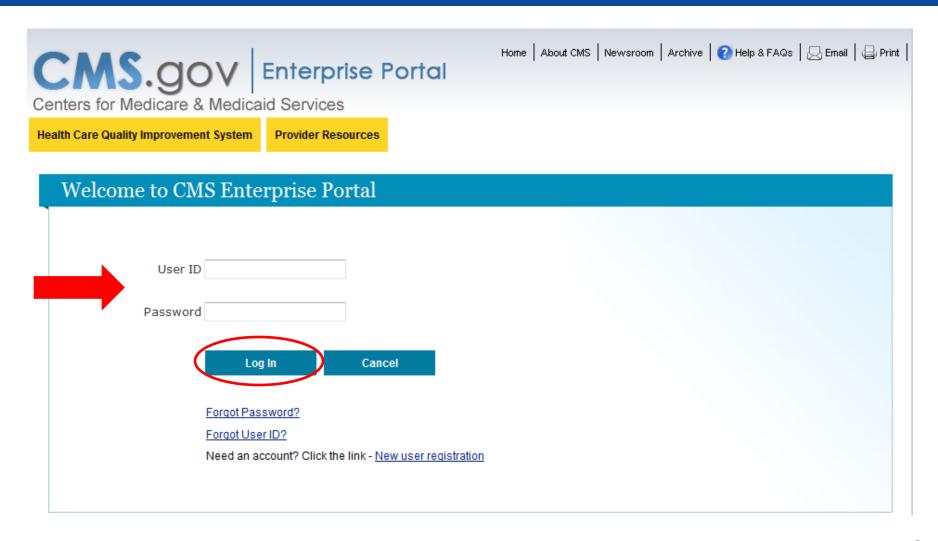
At any time, and for any lawful Government purpose, the government may monitor, intercept, and search and seize any communication or data transiting or stored on this information system.

Any communication or data transiting or stored on this information system may be disclosed or used for any lawful Government purpose.

To continue, you must accept the terms and conditions. If you decline, your login will automatically be cancelled.

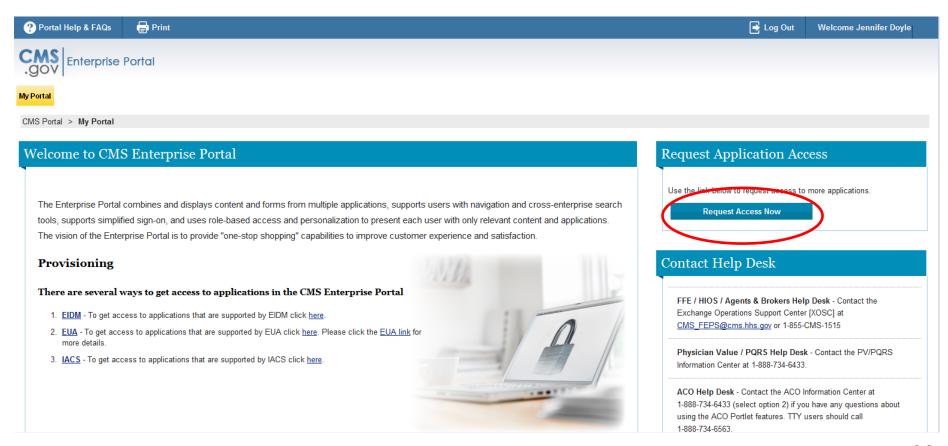


Step 3: Enter EIDM User ID and Password

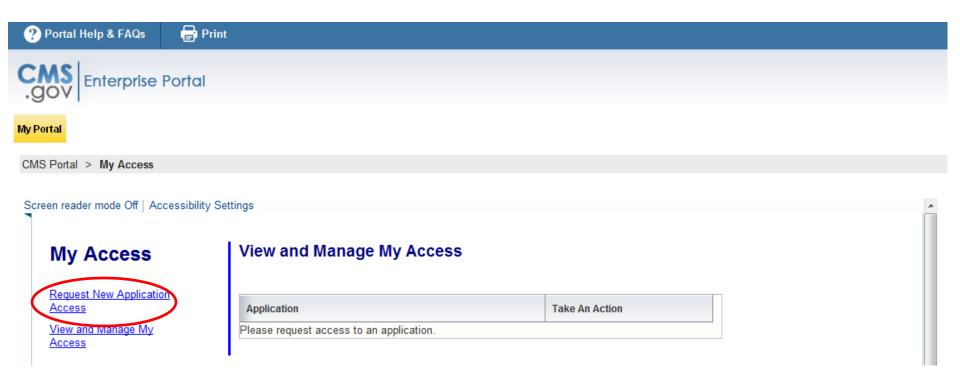


Step 4: Select "Request Access Now" under "Request Application Access"

After a successful CMS Enterprise Portal login, you will be taken to the CMS Portal home page (shown below).

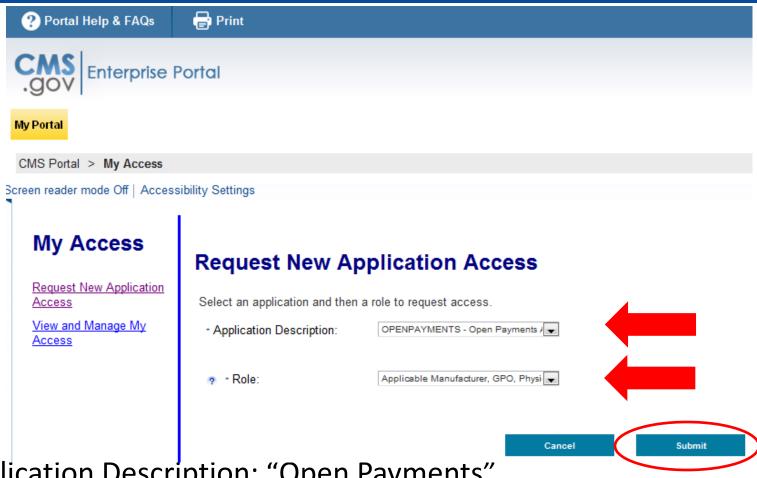


Step 5: Select "Request New Application Access"



If you have access to other CMS applications, you will see those applications listed in the "View and Manage My Access" table.

Step 6: Select Application and Role



- Application Description: "Open Payments"
- Role: "Applicable Manufacturer, GPO, Physician, or Teaching Hospital"

Step 7: Review Identity Verification Information



Screen reader mode Off | Accessibility Settings

My Access

Request New Application Access

View and Manage My Access

Identity Verification

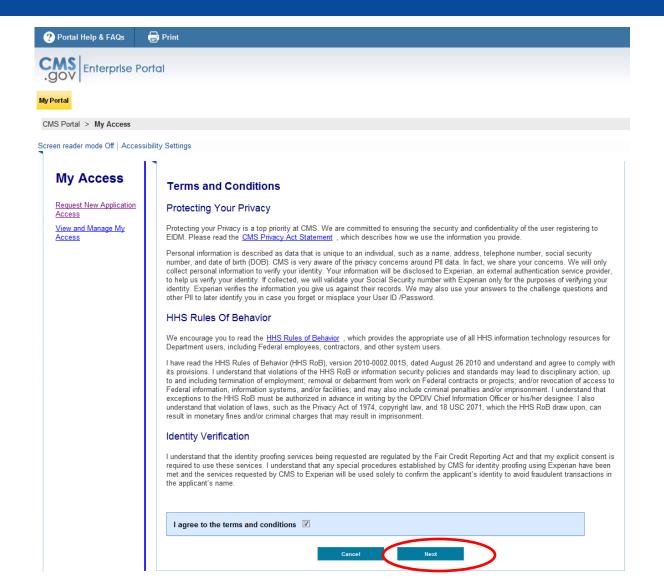
You have selected a role that requires a higher level of security. You will need to complete Identity Verification successfully, before requesting access to the selected role. Below are a few items to keep in mind.

- Ensure that you have entered your legal name, current home address, primary phone number and email address correctly. We will only
 collect personal information to verify your identity with Experian, an external identity verification provider.
- Identity Verification involves Experian using information from your credit report to help confirm your identity. As a result, you may see an entry
 called a "soft inquiry" on your Experian credit report. Soft inquiries do not affect your credit score and you do not incur any charges related to
 them.
- Confirm that you have your personal and financial information available, as the Experian application will pose questions to you, based on data
 in their files. You may want to obtain a copy of your credit report, before proceeding with the role request by selecting this link and following
 the directions provided http://www.experian.com/. For additional information, please see the Experian Consumer Assistance link http://www.experian.com/ http://www.experian.com/help

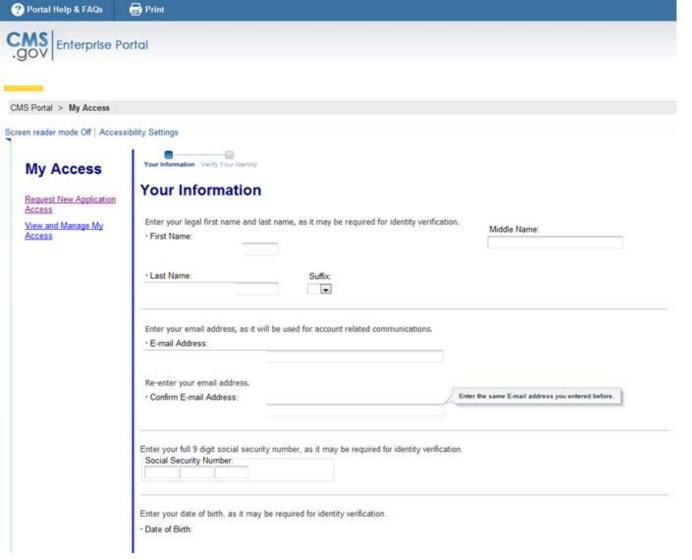
If you elect to proceed now, you will be prompted with a Terms and Conditions statement that explains how your Personal Identifiable Information (PII) is used to confirm your identity. Do you want to continue?



Step 8: Accept Terms & Conditions



Step 9: Confirm Your Information



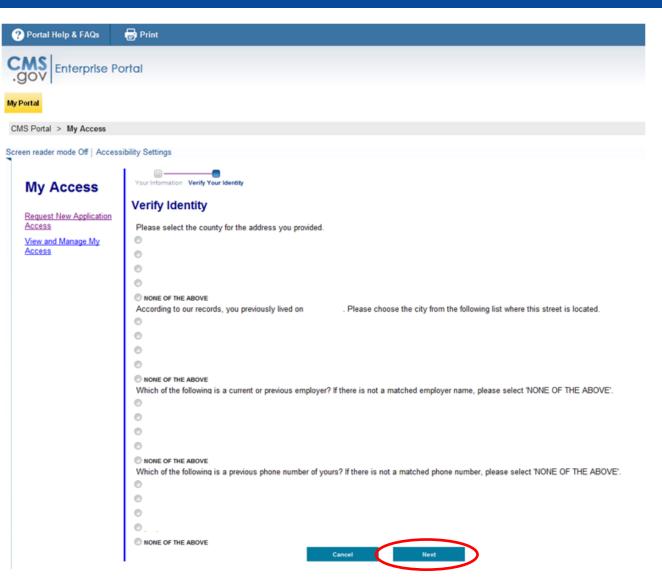
Some fields will be pre-populated with information from your EIDM profile.

Confirm its accuracy; edit fields to correct errors.

Step 9: Confirm Your Information (cont.)

Home Address Line 2:				
- City:	- State:	- Zip Code:	Zip Code Extension:	Country: USA
nter your primary phone nui Primary Phone Number	mber, as it may be required for	identity verification.		

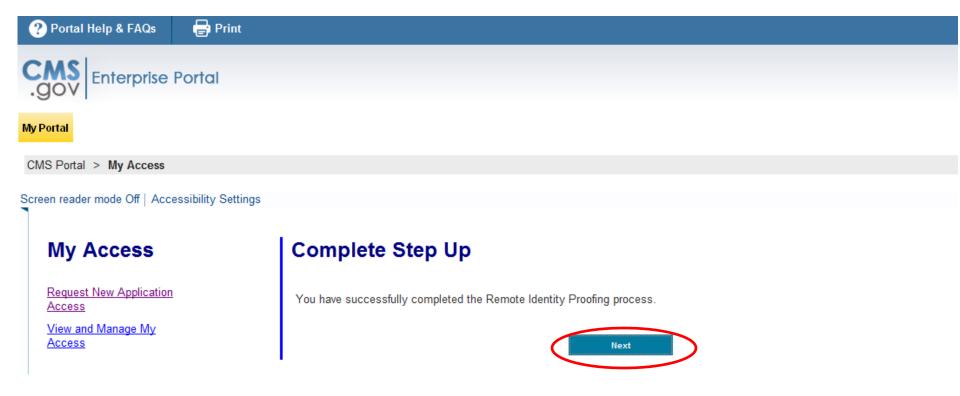
Step 10: Verify Identity



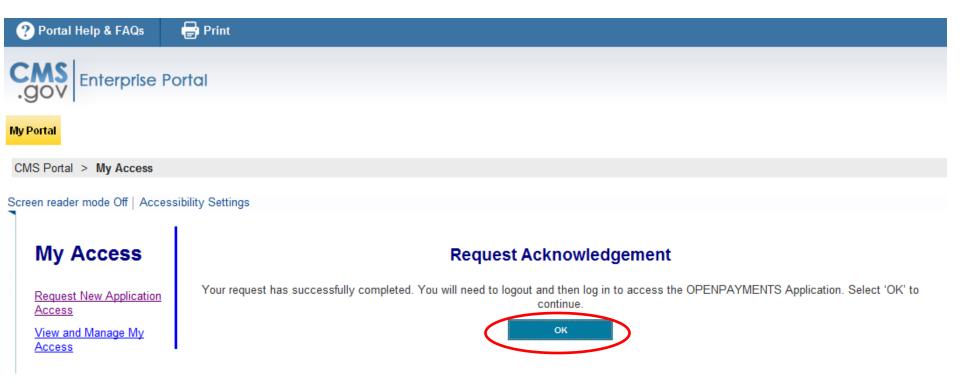
As previously explained, identity proofing questions are pulled from the "soft-credit" inquiry done during EIDM registration.

"Out-of-Wallet"
(OOW) questions are based upon information in your credit report.

Step 11: Verifying Identity Successful

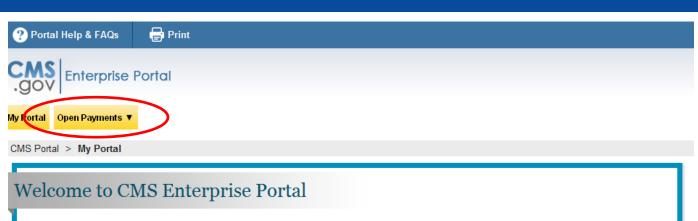


Step 12: Requesting Application Access Successful



- Access may take a few minutes to process
- Log out of EIDM and log back in to view if it was successful

Open Payments Access Successful



The Enterprise Portal combines and displays content and forms from multiple applications, supports users with navigation and cross-enterprise search tools, supports simplified sign-on, and uses role-based access and personalization to present each user with only relevant content and applications. The vision of the Enterprise Portal is to provide "one-stop shopping" capabilities to improve customer experience and satisfaction.

Provisioning

There are several ways to get access to applications in the CMS

Enterprise Portal

- 1. EIDM To get access to applications that are supported by EIDM click here.
- EUA To get access to applications that are supported by EUA click here. Please click the EUA link for more details.
- IACS To get access to applications that are supported by IACS click here.

Log back into the CMS Enterprise Portal to see the Open Payments tab in the menu bar at the top of the screen.

It may take a few minutes for the Open Payments tab to appear.

Next Steps

What You Can Do Now

- Complete Phase 1 by:
 - Registering for your EIDM user ID and password
 - Requesting access to the Open Payments system via EIDM
- Review resources on the CMS Open Payments website: http://go.cms.gov/openpayments
- Register on CMS listserv to receive e-mail updates about the Open Payments program – go to http://go.cms.gov/openpayments and enter email address on the main page, in the "Email Updates" box

2014 Open Payments Timeline

Feb	March	April	May	June	July	Aug	Sept
 Phase 1 Registration and Submission Applicable manufacturers and applicable GPOs Submission of corporate profile and aggregate data 	ission urers and GPOs n of profile and			• Applicable mapplicable G • Step 1 • Step 2 Phase 1 Registrand Teach	egistration and in For Industry hanufacturers and POs - June 1 – June 30 - June 9 – June 30 ation for Physicians hing Hospitals rise Portal (EIDM)		Detailed data published on public- facing CMS website
				Phase 2 Registra Physicians and 1 Hospital Open Payments Review, Disput	reaching s system te, and	_	

Resources Available

- CMS Open Payments website: http://go.cms.gov/openpayments
 - "Physician" and "Teaching Hospital" pages of the website
 - "Events" page: Open Payments technology-focused webinar recordings and materials, plus a schedule of upcoming webinars
 - "Program Registration" page: Supplemental materials, instruction documents, FAQs & other resources
- Open Payments Help Desk:
 - openpayments@cms.hhs.gov or 855-326-8366